

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)	
)	Criminal No. 11-186-S
v.)	
)	
JOSEPH CARAMADRE)	
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
)	
Defendants.)	

**GOVERNMENT'S PROPOSED QUESTIONS TO
INCLUDE IN JURY QUESTIONNAIRE FORMS**

The United States of America, by and through its undersigned attorneys, hereby respectfully requests that, in addition to standard background information, the Court include the following questions in the questionnaires that are to be sent to prospective jurors:

1. Do you know or have you had any dealings, directly, or indirectly, with Joseph Caramadre or Raymour Radhakrishnan, the defendants named in the Indictment, or with their attorneys, James McCormick, Michael Lepizzera and Olin Thompson? If so, please indicate the person with whom you have had prior dealings and the nature of those dealings.

2. The United States Government is represented in this case, as in all cases, by the United States Attorney for this District, who is Peter Neronha. Actually appearing in this case will be Assistant United States Attorneys Lee Vilker and John McAdams. Assisting them will be FBI Special Agent Pamela McDaid and IRS Special Agent Troy Niro. Do you know, or have you had any dealings, directly or indirectly, with Mr. Neronha, Mr. Vilker, Mr. McAdams, Ms. McDaid or Mr. Niro, or with any other member of the staff of the United States Attorney's Offices for the District of Rhode Island? If so, please indicate the person with whom you have had prior dealings and the nature of those dealings.

3. The trial is expected to commence on November 13, 2012 and to last approximately 3 months. Given the length of the trial, the Court has decided that there will be half-day trial days (from approximately 9:00 a.m. to 1:00 p.m.) and that there will not be court on the day of and following Thanksgiving and during the week between the Christmas and New Years holidays. Given this schedule, is there any urgent reason why you would not be able to serve as a juror? If so, please provide explanation:

4. Have you through some experience or in any other way developed a bias or feeling against the United States Government, the Department of Justice, the United States Attorney's Office, the Federal Bureau of Investigation, the Internal Revenue Service, or any federal, state or local law enforcement agency that could prevent you from being fair and impartial in a criminal proceeding brought by the United States?

If so, please explain:

5. Do any of you have a problem with your hearing or vision which would prevent you from giving full attention to this trial?

6a. Have you read, seen or heard any publicity about the case of United States v. Joseph Caramadre and Raymour Radhakrishnan?

b. If so, would any publicity you have seen, heard or read about this case affect your ability, one way or the other, to be a fair and impartial juror? If yes, please explain.

7. This case involves allegations that numerous insurance companies were defrauded. Have you had any negative experiences with insurance companies that would prevent you from being fair and impartial in a case that involves insurance companies? If so, please explain:

8. Some of the witnesses likely to be called during the trial are:

George Agostini
Logan Anderson
William Applegate
Donna Benoit
Jeffrey Chase-Lubitz
Harrison Condit
Walter Craddock
David DiSanto
Eugene D'Nofrio
Diana Franchitto
Anthony Gwiazdowski
Edward Hanrahan
Ellen Healey
Carol Jackson
Matthew Keilly
Donald Kushner
Edward Maggiacomo, Jr.
Thomas Maltais
Sean Moylan
Scott Richer
Sandra Romano
Alan Ross
Stephen Souza
Marshall Votta
John Wiggins

Do you know or have you had any dealings, directly, or indirectly, with any of the above-listed individuals. If so, please indicate the person with whom you have had prior dealings and the nature of those dealings:

Respectfully submitted,

PETER F. NERONHA
UNITED STATES ATTORNEY

/s/ Lee H. Vilker
LEE H. VILKER
Assistant U.S. Attorney

JOHN P. MCADAMS
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U.S. Attorney's Office
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CERTIFICATE OF SERVICE

I, hereby certify that on this 8th day of May, 2012, I caused the within Government's Proposed Questions to Include in Jury Questionnaire Forms to be served via the Court's Electronic Filing System on:

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/s/ Lee H. Vilker

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